

Exhibit C

Veasey v. Perry

Defendants' Objections to Plaintiffs' Counter Designations

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
Banks, Yannis				
	9:7-9			
	9:14-16			
	20:4-16	19:20-20:3 and Exhibit 2		
	23:13-25	24:11-23		
	26:14 – 27:25			
	28:11-25			
	29:15 – 31:5			
	34:12 – 36:17			
	37:6-13			
	39:6-19			
	43:5-21			
	43:22-24			
	44:20 – 45:6			
	45:10 – 23			
	47:20 – 48:13			
	49:17-21			
	50:20 – 51:9	50:12-19, 51:10-11	Incomplete	
	52:20 – 54:14			
	55:4 – 56:2	56:3-25, 153:24-154:15		opinion (154:14-15)
	58:7-19			
	62:8-22	62:1-7		
	63:20 – 64:2			
	65:23 – 67:23			
	69:1 – 71:8	68:15-25	Incomplete	
	72:6-11			
	73:18 – 74:8			
	74:15 – 75:6			
	75:10-25			

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	76:8-15			
	82:9 – 86:3	81:6-82:4		
	86:18 – 87:4			
	88:2-11			
	88:12 – 89:15		Questions at 88:21-23 and 89:5-9 misstate the witness's testimony	
	89:22 – 90:15	89:16-21	Incomplete; calls for speculation; calls for a legal conclusion	
	91:15 – 92:10			
	92:19 – 95:9			
	97:5-12			
	97:15 – 99:19		Question at 99:11-12 misstates the witness's testimony	
	101:1 – 102:20			
	109:19 – 110:9	109:14-18, 110:14-16		
	113:1-10			
	113:25 – 116:1	4.725	Incomplete	
	117:7 – 118:7	116:2-117:6	Incomplete; calls for speculation	
	120:3 – 121:2		Questions at 120:3-6 and 120:20-24 call for speculation	
	121:20 – 122:20			

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	124:1 – 126:9		Questions at 124:19-21 and 125:6-11 call for speculation; Relevance	
	126:10 – 127:12		Relevance	
	127:18 – 128:14			
	130:21 – 132:21			
	135:9 – 136:5			
	137:7-22		Calls for a legal conclusion; best evidence is the document itself	
	140:17 – 142:7		Questions at 141:2-4 and 141:10 call for speculation	
	149:5 – 150:8			
	151:2 – 152:6			
	152:7 – 153:23			
	155:23 – 156:4	154:16-155:22		narrative (154:16-155:22)
	157:10 – 158:6			
	160:20 – 162:17	158:10-160:8, 162:18-163:16		narrative (158:12-159:7), (159:11-160:8), (162:20-163:16)
	164:7 – 166:2		Question at 165:14-16 calls for speculation;	
	167:6 – 168:10	168:21-169:20, 170:12-15		Hearsay (169:9-20)

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Defendants' Objections to Plaintiffs' Counter Designations

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	173:6 – 174:18		Question at 173:25-174:2 calls for attorney-client privileged	
	177:17 – 179:10	179:12-15		
	180:4-12			
	181:15 – 182:18	183:22-184:6		
Barber, Ruby				
	3:25-4:5			
	6:9-16			
	6:23-7:7			
	8:4-11			
	8:23-10:11			
	10:16-11:2			
	11:6-8			
	12:1-3			
	12:20-13:2			
	13:21-24			
	14:3-16			
	18:1-13			
	18:19-19:4			
	23:19-24:6			
	25:6-18			
	26:17-20			
	27:3-8			
	27:11-28:6			
	28:16-23			
	29:1-3			
	29:8-20			

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	29:23-30:7			
	30:15-20			
	31:5-14	30:24-31:4		
	31:19-21	31:22-32:1		
	32:8-10			
	32:15-19	32:20-21		
	33:4-9			
	33:24-34:17			
	35:4-7			
	35:19-36:21			
	37:17-38:20			
	40:7-13			
	41:11-42:3			
	44:7-20			
	44:21-45:19			
Bates, Sammie				
	7:9-11			
	7:21-25			
	8:3-4			
	8:15-19			
	10:2-10			
	10:18-22			
	12:18-13:6			
	13:19-14:12			
	14:17-15:3			
	15:23-16:9			
	17:15-18:6			
	20:22-21:1			
	27:8-22			

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Defendants' Objections to Plaintiffs' Counter Designations

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	28:4-7			
	30:1-31:16	29:14-29:25		
	32:6-10	31:19-32:5	Incomplete	
	33:7-24	33:25-34:1	Incomplete	Improper designation/incomplete - only portion of "Q" with no "A"
	34:2-21			
	35:19-36:1			
	36:22-37:14			
	38:17-25	37:25-38:16		
	39:9-21	39:1-3		
	40:7-12	40:13-42:1		
	42:2-7			
	42:17-43:2	42:11-16		
	43:16-45:10			
	45:11-19			
	46:6-10			
	46:21-48:8			
	48:11-49:19	49:20-21	Incomplete	Nonresponsive/unresponsive volunteered
	50:4-51:11			
	51:13-22			
	52:13-53:18		Question at 52:13-52:20 is irrelevant and calls for	
	53:21-23			
	53:24-54:2	54:9-17		
	55:1-56:4			
	54:18-25			
	66:10-23			

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	68:7-9			
Baydush, Lee				
	5:19-25			
	10:20-11:8			
	12:9-13:9			
	15:10-17			
	15:21-16:15			
	16:24-17:24			
	26:8-17			
	34:2-35:16			
	35:17-36:23			
	37:9-23			
	38:8-12			
	46:6-48:6			
	48:22-49:10			
	51:19-24			
	52:12-54:3			
	56:6-57:3			
	62:22-63:11	63:12-64:15		
	65:9-66:1	66:2-7		
	69:1-70:11			
	70:12-76:15			
Bessiake, Michelle				
	9:19-21		Hearsay	
	11:25-12:5		Hearsay	
	12:9-25		Hearsay	
	13:15-14:1	13:1-12 14:2-4	Hearsay	

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	14:5-23	64:24 - 65:5 101:13-15 101:16-25	Hearsay	
	15:1-7		Hearsay Relevance	
	15:12-17	15:18 - 16:5	Hearsay	
	16:6-15	16:16 - 17:8 25:16-22	Hearsay Relevance	
	17:11-18:1	18:2-16	Hearsay Relevance	
	18:24-19:9	19:10 - 20:1 23:23 - 24:20	Hearsay Mischaracterizes testimony as to: 24:19 - 20:1 Relevance Vague	

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	20:2-7	20:8-9	Hearsay Relevance	
	20:10-18	20:19 - 22:1	Hearsay Relevance	
	22:12-23:11	22:2-11 23:12-17	Hearsay Relevance Vague	
	23:18-22		Hearsay Relevance	
	24:21-25:13	25:16-22	Hearsay Relevance	
	25:23-27:4		Hearsay Relevance	

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	28:5-30:17	30:18-23 31:4-20	Hearsay Relevance Calls for speculation	
	38:10-16	38:17-19	Hearsay Relevance	
	38:20-39:2		Hearsay Relevance Speculation	
	40:2-20		Hearsay Relevance as to: 40:16 - 41:2	
	40:21-41:2		Hearsay	
	41:13-42:13		Hearsay Relevance as to: 41:22 - 42:13	
	42:21-43:15	42:14-20	Relevance as to: 42:21 - 43:1	

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	43:16-44:17	44:18 - 45:3	Hearsay Relevance	
	45:4-7		Hearsay Relevance	
	45:19-23	47:22 - 48:1 49:23 - 50:12 57:20 - 58-5	Hearsay	
	46:4-5		Hearsay Relevance	
	46:13-21		Hearsay Relevance	
	48:2-18	49:11-17	Hearsay Relevance	
	50:4-15	51:2-8	Calls for a Legal Conclusion Hearsay	
	51:9-52:12		Hearsay	

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Defendants' Objections to Plaintiffs' Counter Designations

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	52:15-53:3	53:7-12 53:17 - 54:25 59:20 - 60:1	Hearsay Assumes Facts Not In Evidence as to: 52:4-12	
	53:13-16		Hearsay	
	55:1-9	55:10-25	Hearsay	
	56:1-24	59:9-19 61:3-5 62:1-5 89:21-25 100:20-24 101:7-8	Hearsay Assumes Facts Not In Evidence as to: 9-19	
	56:25-57:5	57:6-16	Hearsay	
	57:17-19		Hearsay	
	58:8-15	58:16-20	Hearsay	
	60:2-61:2	61:3-5	Hearsay	
	61:6-25		Hearsay	
	63:6-22	59:20 - 60:1 63:1-5	Hearsay Incomplete to the extent it does not include the question (63:5)	

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Defendants' Objections to Plaintiffs' Counter Designations

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	63:17-64:19		Hearsay Calls for Legal Conclusion as to: 63:17-64:10	
	64:20-23		Hearsay	
	65:10-21	68:15-17	Hearsay	
	66:23-68:14	66:21-22 107:14-19 108:4-14	Hearsay Relevance Failure to Authenticate Mischaracterizes testimony as to:	
	68:18-22	68:23 - 69:11 90:16 - 91:16	Hearsay Calls for speculation	
	69:25-71:4	68:15-17	Hearsay Relevance	
	71:8-15	71:5-7 71:16-20	Hearsay Calls for Legal Conclusion	
	74:23-75:8	71:5-7	Hearsay	

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	77:8-78:15	71:5-7	Hearsay Relevance	
	78:24-79:8	78:21-23 98:5-8	Hearsay Relevance	
	79:25-80:7	78:21-23	Hearsay	
	80:8-20		Hearsay Relevance as to: 80:16-20	
	81:15-82:20	49:23 50:3 79:25 - 81:8	Hearsay Calls for Legal Conclusion as to: 82:8-20	
	83:1-20		Hearsay	
	83:21-84:15		Hearsay	
	90:3-11		Hearsay Relevance	
	91:24-92:7		Hearsay Relevance	

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Defendants' Objections to Plaintiffs' Counter Designations

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	92:19-95:6		Hearsay Relevance as to: 92:19 - 94:13 92:18 - 95:6 Failure to	
	95:15-96:6	95:7-14 97:8-14	Hearsay	
	96:11-97:7	78:21-23	Hearsay Speculation as to: 96:23 - 97-7	
	97:15-23	97:24 - 98:1	Hearsay	
	98:9-100:9	78:21-23 98:5-8	Hearsay Relevance	
	100:10-14		Hearsay	
	101:25-101:6		Hearsay	
	105:22-106:12		Hearsay Relevance as to: 106:10-12	
	107:11-13		Hearsay	
	107:20-108:3		Hearsay Speculation	
	108:15-18		Hearsay	

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Defendants' Objections to Plaintiffs' Counter Designations

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	109:6-113:5		Hearsay Assumes Facts Not In Evidence as to: 109:6 - 110:13 110:18 - 111:1 111:2-8 111:17 - 112:1 Calls for a Legal Conslusion as to: 111:17 - 112:1 112:17-23 112:24 - 113:5 Relevance	
Bingham, Ramona				
	6:9-16			
	7:1-2			
	7:9-16			
	13:13-14:10			
	16:10-16			
	16:19-17:15			
	18:14-19:1			
	19:2-25			
	20:5-21:19			
	21:25-23:16			
	23:17-25			
	24:13-25:23			

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	26:23-27:7			
	32:8-22			
	34:2-35:8			
	36:18-37:13			
	38:2-21			
	39:23-40:22	40:23-25		
	43:19-44:9		Relevance; Unduly prejudicial	
	44:18-19		Relevance; Unduly prejudicial	
	47:22-48:15	48:16-49:16		
	49:17-52:15			
	54:25-55:17			
	56:21-57:20			
	58:16-60:11	60:12-20		
	61:6-9	61:10-22		
	61:23-62:20			
	67:13-68:6			
	63:15-64:13	63:9-15		
	69:9-19			
	72:16-22			
	73:8-16			
	74:1-7			
	76:9-14			
	80:11-13			
	80:22-81:13			
	85:12-25			
	87:4-11			
	97:14-95:9			

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Defendants' Objections to Plaintiffs' Counter Designations

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	98:13-101:20			
	103:2-10	103:11-106:19		
	105:11-21			
	106:5-19			
	109:5-18			
	109:21-112:6			
	126:25-127:18	127:19-128:12		127:19-23 irrelevant, immaterial
	137:12-138:9			
	139:23-140:10			
	140:11-16	141:6-14		
Bueck, Colby				
	15:18-17			
	18:2-20:10		19:3:-18 -- Hearsay	
	20:25-22:22	20:21-24		
	22:8-23:25			
	25:12-24			
	26:7-17			
	27:2-29:25	30:1		
	143:12-16			
	151:16-152:1			
	161:11-162:2			
	265:9-275:4	265:6-8	267:2-269:22; 272:7-273:12 -- Foundation, vague, calls for speculation	
Burns, Anna				
	4:16-18			
	44:15-17			
	7:3-8:18			

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	9:11-19			
	11:8-12:9			
	12:18-25			
	13:1-19			
	15:18-25			
	16:1-2			
	19:13-17			
	20:8-12			
	21:2-24:5			
	24:19-25			
	25:14-28:16			
	29:18-30:4			
	33:23-34:4			
	34:19-35:17			
	35:18-36:2			
	36:5-38:3			
	38:10-13			
	54:14-12		Incomplete;	
	55:4-7			
	55:11-16			
	56:2-13			
	63:25-64:7			
Carrier, Calvin				
	7:3-23			
	9:21-17:21		14:21-16:21 -- Relevance	
	19:14-21			
	21:1-22:19			
	23:2-52:12			

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	52:19-55:20			
Carrier, Floyd				
	6:25-7:6			
	7:15-8:12			
	8:21			
	9:8-18:18			
	28:10-37:6			
	38:1-16			
	40:4-51:10		41:16-42:16; 42:20-44:17 -- Relevance	
	51:13-52:3			
	52:6-17			
	52:21-55:6			
	55:10-19			
	55:21-56:2			
	56:6-7			
	56:9-57:1			
	57:6-68:2			
	68:6-7			
	68:10-70:4			
	70:15-71:18			
	71:22-72:17			
	72:21-22			
	73:7-20			
	74:1-25			
	76:17-77:12			
	79:13-82:2			
	83:11-99:2			
	99:6-10			

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	99:13-128:19			
	129:17-143:25			
Cesinger, Katherine				
	7:18-8:10			
	10:11-12:5			
	12:15-13:20			
	15:13-19			
	18:6-21			
	19:4-29:18	29:19-30:13		
	30:14-36:23			
	37:17-73:15			
	74:17-80:1			
	80:13-84:22			
	86:1-93:23			
	94:18-109:9			
	111:1-116:21			
	117:15-118:4			
	120:19-122:11			
	123:11-124:13			
Clark, Imani				
	9:16-19			
	10:9-12	10:1-8		
	12:11-13:2	13:3-7		
	13:8-11	13:22-24 48:5-6		
	13:16-21	14:7-12 14:16-19 78:15-16		
	14:3-6			

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Defendants' Objections to Plaintiffs' Counter Designations

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	14:20-24			
	15:5-7	15:8-12		
	16:23-17:3	16:4-22		
	17:4-18:2	18:3-6		
	18:7-16	18:17-19:9		
	19:10-25	20:1-5 74:9-10 83:13-84:3		
	20:6-21	20:22-23		
	20:24-21:8		21:2-8 --	
	21:9-22			
	21:23-22:3			
	22:8-9			
	23:9-24:2	24:3-9		
	24:10-25:6	25:7-13 112:15-21		
	25:14-27:21			
	27:22-28:4			
	28:5-13	13:3-7		
	28:14-29:1	29:2-4	28:18 - 29:16-1 -- Atty-Client Privilege	
	29:5-12	29:13-16	Mischaracterizes testimony	
	29:17-20	29:21-30:12		
	30:13-20	30:21-31:4 31:19-32:5		
	32:8-33:14	33:15-25		
	34:1-12	33:10-19		

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	34:21-35:8	13:3-7 36:15-20		
	37:7-18	37:19-24	Vagueness	
	38:21-39:6			
	39:19-24		Assumes Facts Not in Evidence	
	39:25-41:16	41:8-12	41:8-16 -- Mischaracterizes Testimony	
	44:15-17	44:5-14 44:18-20	Relevance	
	45:9-46:8	92:23-93:6 95:10-16		
	47:12-20	47:21 - 48:6 48:5-6	Mischaracterizes Testimony	
	48:1-4			
	48:7-49:5	111:12-22	Relevance	
	49:22-51:3	51:4-24	Relevance	
	52:8-16	52:24-53:10	Relevance	
	53:18-23	53:24-54:3 92:19 - 93:6		
	54:14-25		Relevance	
	56:10-57:15	57:19-21 111:23-112:5	Relevance	
	57:22-58:19	58:20-59:1 111:12-22	Relevance	

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Defendants' Objections to Plaintiffs' Counter Designations

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	59:13-61:5		Relevance 59:13-60:6 -- Mischaracterizes Testimony as to:	
	61:6-62:1		Calls for a Legal Conclusion	
	62:5-11	62:16-19 62:23-24 111:6-11	62:9-11 -- Calls for a legal conclusion 62:9-11 -- Assumes facts not in	
	63:3-7		63:3-7 -- Relevance	
	63:8-11			
	64:3-7	64:8-10		
	64:11-24			
	65:7-15	65:16-66:3		
	66:4-6	66:7-23		
	66:24-67:7	67:8-16		
	67:17-21			
	68:6-14			
	68:22-69:8	69:9-17		
	70:15-17			
	71:2-14	70:20-23		
	71:24-72:16			
	72:17-25		72:21-25 -- Assumes Facts Not	
	73:1-12			

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Defendants' Objections to Plaintiffs' Counter Designations

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	73:15-74:8			
	74:11-24			
	74:25-75:18		75:7-11 -- Calls for a Legal Conclusion	
	75:19-76:9	76:5-9 76:10-22	75:19-23 - Calls for a Legal Conclusion 76:5-9 --	
	76:23-77:8		77:1-4 -- Calls for a Legal Conclusion	
	77:11-20	78:3-11	77:11-14; 77:15-20 -- Calls for a Legal Conclusion as to:	
	78:8-14	78:15-16		
	81:4-82:5	78:3-7 80:21-81:2	81:22-25 -- Mischaracterizes Previous Testimony 81:22-25 -- Calls for a Legal Conclusion	
	82:22-83:1	83:2 - 84:3		
	84:4-85:1	84:4-8 84:21-24	84:4-20 -- Relevance 84:21 - 85:1 -- Speculation	
	85:6-24	85:2-5		
	85:25-87:13	86:3-7 86:15-17 87:14-19	15:18-21 -- Relevance 86:3-8; 86:22 - 87:2 - - Assumes facts not in evidence 87:3-13 --	

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	87:23-88:17			
	89:11-16	89:1-10 89:17-21		
	89:22-90:2	89:17-21 90:3-7 92:15-18		
	94:13-23	94:24-95:4		
	95:5-9	95:10-16		
	96:24-97:18	96:24-97:3 97:7-10	96:24 - 97:4 -- Calls for Legal Conclusion 97: 12-15; 87:16-18 -- Speculative 96:24 - 97:4 -- Argumentative	
	99:3-22		Relevance	
	100:1-102:6		Relevance Failure to	
	104:17-25		Calls for a Legal Conclusion	
	105:3-106:4	106:5-107:5	105:3-13 -- Calls for a legal conclusion 105:14-17; 105:18-24; 105:25 - 106:4 -- Speculation	
	111:16-22	111:12-15		

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	112:7-14			
Denton, Jim				
	4:24-5:2			
	6:24-7:3			
	7:10-22			
	8:1-13			
	9:21-10:3			
	12:3-15			
	13:9-18			
	13:22-25			
	14:13-16:15			
	16:23-17:2			
	18:15-19:12			
	24:13-25:8			
	27:9-16			
	27:21-28:16			
	29:4-18			
	29:24-25			
	30:1-31:25			
	32:6-12			
	32:16-23			
	33:19-35:12			
	36:2-11			
	39:16-20			
	40:5-25	40:23-25	Irrelevant, Hearsay	
	42:1-4			
	42:9-22			
	43:5-11			
	43:17-44:2			

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	44:17-45:10			
	46:8-19			
	46:23-48:11			
	49:10-55:19			
	58:7-61:10			
	62:3-23			
	63:22-25			
	64:8-10			
	64:13-65:11			
	67:2-10			
	67:14-68:6			
	68:14-16			
	69:16-19			
	70:16-25			
	77:7-12			
	80:12-24			
	81:4-18			
	82:8-24			
Dewhurst, David				
	8:7-8			
	18:25-20:9			
	20:15-21:7			
	24:21-24			
	25:17-26:3			
	26:15-27:11			
	28:2-7			
	28:23-30:24			
	31:18-21			
	34:10-18			

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	51:8-21			
	55:11-13			
	55:16-56:1			
	56:4-11			
	56:15-57:7			
	60:12-61:21			
	64:1-66:8			
	70:13-71:1			
	75:21-76:6			
	76:18-77:9			
	77:17-78:4		Incomplete (does not include answer in response to the question posed at 78:2-7).	
	78:6-15			
	79:12-80:18			
	85:6-25			

Veasey v. Perry

Defendants' Objections to Plaintiffs' Counter Designations

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	97:1-98:-22	96:14-25	Incomplete (does not include question at 96:22-25). FRE 802. Hearsay insofar as relies upon unidentified "data" at 97:14-15. Irrelevant and nonresponsive insofar as it includes opinions about the Department of Justice's	Objection (96:22): form, speculation
	102:4-103:1			
	104:9-16			
	105:17-106:1		Incomplete (does not include answer to question at 105:25-106:1)	
	106:11-107:3		Incomplete (does not include question at 106:9-	
	107:6-8			
	111:13-14			
	111:17-111:17			
	111:24-112:1			
	112:4-113:3			
	117:5-15			

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	122:24-123:14			
	124:21-22			
	124:25-127:8		Relevance	
	135:7-9			
	135:18-136:12		Hearsay insofar as purports to represent statements by unidentified Democratic	
	137:2-11	137:1-1		Objection: sidebar
	137:20-138:15			
	153:14-19			
	153:22-154:21			
	154:24-155:2			
	166:2-25		Nonresponsive. Document (SB 14) speaks for itself. Contradicted by text of SB 14.	
	172:23-173:8		Hearsay insofar as purports to represent statements by unidentified	
	186:13-187:9			
	192:2-194:1		Nonresponsive as to 193:8-194:1	

Veasey v. Perry

Defendants' Objections to Plaintiffs' Counter Designations

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	194:8-196:1		Nonresponsive insofar as it relates to activities undertaken after	
	208:19-209:6		Hearsay insofar as purports to represent statements by unidentified voters.	
	258:2-17		Calls for a legal conclusion	
	265:7-268:3	268:4-269:17	Hearsay insofar as purports to represent statements by Democratic senators. FRE 802. Unresponsive and	
	269:21-272:16		Unresponsive and narrative testimony.	
	273:2-274:6		Unresponsive and narrative testimony.	
Eagleton, Naomi				
	8: 6 - 13			
	8:17-25			
	10:13-20			
	11:20-12:21			
	17:10-24			
	19:24 – 20:4			

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	22:5-9			
	23:20 – 24:3			
	26:3-12			
	29:25 – 30:6			
	30:14-20			
	31:1-10			
	31:16-18			
	37:6-21			
	38:1-15			
	39:18-25	39:12-17		
	41:12-42:8			
	45:7-12			
	45:13-24			
	46:3-16		Incomplete	
	47:23-48:2			
	49:23 – 50:8			
	50:11-15	50:11-15		
	50:19-51:2			
	51:5-14			
	52:4- 54:15		52:4-8; 52:15-21; 53:8-53:25 -- Assumes facts not in evidence; Relevance	
	55:17–56:17	56:18-25		
	57:1–17			
	58:13-20			
	59:16-60:25			
	61:6-8			
	61:22-62:9			

Veasey v. Perry

Defendants' Objections to Plaintiffs' Counter Designations

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	62:15-22	62:10-14		
	63:5-21	64:6-9		
	65:10-15			
	66:2-24			
	70:9-12			
	71:10-22	71:23-72:9		
	72:14-23			
	73:7-15			
	73:19-21			
	74:15-77:8			
	77:12-78:4	78:5-17		
	80:6-17	80:18-24; 81:17-19	Incomplete	
	82:17-23			
	83:22-84:13			
	85:25-86:15			
	88:14-89:10			
	89:16-24			
	90:6-11			
	92:9-19	92:20-22		
	93:4- 25		Incomplete	
	94:2-10		Vague 94:2-10 -- Relevance	
	94:16- 96:3		Vague 94:16-96:3 -- Relevance	
	96:11-19			
	97:24-99:4		97:24- Assumes facts not in evidence; Relevance	

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	99:13-22			
	100:9 – 101:19			
	103:5-8			
	103:17-19			
	104:12-16			
	107:12 – 110:19		109:19-110:19 -- Assumes facts not in evidence, Vauge; Relevance; Calls for speculation	
	111:19 – 115:6		114:8-12; 114:13- Hearsy; Assumes facts not in evidence; Relevance; Calls for	
	115:17 – 25	116:1-20	115:17-25 -- Hearsy, Assumes facts not in evidence; Relevance; Calls for	
	116:21-118:7	120:14-21; 121:19-21	116:21-118:7 -- Hearsy; assumes facts not in evidenced; Relevance; Calls for	
	121:6-9			
	121:16-18			
	122:7-17			
	122:18-123:14			
	125:20 – 126:8	125:11-19; 126:9-16		

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Defendants' Objections to Plaintiffs' Counter Designations

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	128:25 – 129:24			
Espinoza, Estela				
	8:1-7			
	9: 16-24			
	10:18-20			
	12:21-25			
	13:1-2			
	14:3-4			
	15:17-19			
	16:7-8			
	19:5-6			
	19:15-23			
	20:1-6			
	20:11-13			
	24:7-24			
	26:16-18			
	28:11-13			
	28:23-29:1			
	31:6-10			
	31:18-20			
	32:16-22			
	33:18-21			
	34:3-6			
	34:14-18			
	34:25–35:13			
	35:24–37:4			
	39:9-19			
	40:5-25			
	41: 13-15			

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	42:3-14			
	47:3-12			
	48:10-49:8			
	51:3-13			
	52:1-3			
	53:3-11			
	53:14 – 54:11		Relevance.	
	55:10-57:13			
	60:10-19			
	61:2-7			
	61:21-62:2		Relevance; Calls for speculation.	
	62:3-63:5			
Estrada, Lionel				
	8:18–9:3			
	9:11-10:12			
	11:16-13:25			
	14:9–17:19			
	18:8-19:12			
	19:22–20:2	19:13-21		
	20:17-21:16			
	22:23-23:9			
	24:1-26:3			
	26:17-27:17			
	28:9-17			
	29:7 – 30:8			
	30:9-15			
	41:10-17			
	42:10-15			

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	43:5-10			
	45:7-18			
	30:22-25			
	31:13-18			
	32:1-15			
	33:3-34:6			
	34:9-16			
	35:13-15			
	37:25-38:4			
	38:15-21			
	46:9-25			
	47:7-21			
	49:2-24			
	50:7-51:11	51:12-14		
	51:15-52:1			
	52:6-23			
	54:5-13			
	56:6-20			
	58:5-19			
	58:20-59:14			
	59:24-61:19			
	62:4-25			
	63:3-16			
	64:1-67:6			
	73:7-20			
	73:21-75:14			
	75:22-23			
	76:3-77:10	77:22-78:3		
	78:4-18			

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Defendants' Objections to Plaintiffs' Counter Designations

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	79:11-14			
	79:18-80:18			
	80:24-81:10			
	81:15-25			
	82:16-83:4			
Farinelli, Victor				
	9:24-10:23	11:10-12		
	19:14-20	18:20-19:8		
	23:1-23		Incomplete	
	32:4-33:19			
	35:1-23 ????			
	35:24-37:23	37:25-38:6		
	38:7-39:2	39:3-8		
	39:9-42:24		42:23-24 -- Hearsay, Relevance, Assumes facts not in	
	47:11-25	48:4-49:1		
	49:2-54:23			
	55:16-56:24			
	59:18-60:25	62:23-63:2		
	65:16-66:21			
	67:5-9			
	81:10-17			
	82:8-83:24	84:3-12		
	85:19-88:25	90:5-8;		
	94:4-99:15	93:25-94:3		
	107:2-20	107:21-108:3		
	111:4-10			
	128:12-16	128:7-11; 128:17-18		

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	155:4-156:22	157:2-4		
Fraser, Troy				
	10:21-24			
	38:19-39:12			
	72:9-78:17			
	86:17-87:15	85:12-13; 86:11-16	Incomplete (does not include the question at 85:12-	
	88:5-89:12			
	97:1-11		Hearsay	
	109:5-19	243:10-244:14		
	123:13-124:5			
	127:3-128:5			
	136:16-139:21			
	142:1-15			
	143:13-145:10			
	150:21-151:22			
	154:12-157:6			
	178:7-180:8		179:22-180:8 -- Relevance; Non-Responsive	
	181:5-182:5			
	197:14-198:19			
	201:7-203:7			
	212:6-213:3			
	262:19-263:7			

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Defendants' Objections to Plaintiffs' Counter Designations

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	309:18-335:2	262:6-8	320:19-321:7; 330:10-333:5; 333:12-20 -- Relevance 330:10-331:7 -- Calls for a Narrative Response 321:12-322:4; 333:12-20; 334:8- 335:2 -- Speculative 334:8-335:2 --	
Gandy, Ken				
	6:10-13			
	9:8-12			
	10:12-13			
	11: 13-17			
	12:4-11			
	13:8-22			
	15:9-12			
	15:18-17:3			
	17:19-22			
	18:14-25			
	19:1-16			
	26:11-15			
	27:12-15			
	27:19-25			
	28:1-2			
	28:11-13			
	28:20-25			

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	29:13-15			
	30:13-20			
	31:12-32:1			
	32:8-10			
	32:16-34:9			
	36:3-37:5			
	38:2-10			
	40:14-41:3			
	44:1-4			
	44:16-18			
	45:19-46:4			
	46:11-13			
	51:4-10			
	51:11-52:10			
	52:23-53:12		Relevance	
	54:11-20			
	55:11-14			
	57:4-12			
	57:25-58:2			
	59:4-60:6		Relevance	
	62:19-63:4			
	66:6-10			
	67:7-8			
	69:1-11			
	70:13-16			
	74:22-75:9			
	76:2-10			
	76:18-77:6			
	78:15-79:11			

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	79:25-80:6			
Gholar, Elizabeth				
	5:12-13			
	5:20-6:2			
	9:1-6	62:21 - 63:14		
	9:13-16			
	10:23-11:9	10:23 - 11:14		
	13:1-6	61:10 - 62:20		
	14:11-12			
	17:7-9	62:21 - 66:8 66:15 - 19		
	17:17-21	74:3 - 75:3		
	27:18-25	71:19 - 74:1		
	29:13-16	29:13 - 30:9		
	29:20-22	30:7 - 30:9		
	30:1-6	61:2-9		
	37:11-17	68:17 - 70:15		
	37:20-24	70:16 - 71:18		
	38:4-7			
	41:4-8	71:4-5		
	53:8-22	87:23 - 88:9		
	54:4-55:3			
Golando, Martin				
	8:11-16			
	13:10-13			
	14:9 – 15:4			
	15:21 – 16:17			
	16:18 – 19:5	19:6-12		
	31:10-18			

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	32:16 – 33:5	32:3-7		
	34:10 – 35:18			
	35:22 – 36:13			
	36:22 – 37:17			
	37:19 – 38:10			
	38:25 – 39:16	39:17-19		
	39:20 – 40:22			
	42:1 – 43:20			
	46:21 – 47:14			
	48:25 – 50:8			
	53:15 – 54:1	53:4-14		
	55:2 – 56:7			
	56:18 – 57:4			
	57:18 – 58:5			
	58:6 – 59:10			
	63:11 – 64:14	62:9-21	Incomplete; mischaracterizes the witness' testimony Question at 63:10- 63:14 calls for legal	Opinion (62:11-21)
	70:23 – 71:22			
	71:23 – 72:25			
	73:1-14			
	78:19-82:12		Question at 81:12- 81:21 calls for speculation	
	83:4 – 84:10			
	84:23 – 85:6			

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	87:12 – 88:6			
	88:23 – 89:15			
	89:16 – 90:25			
	91:6 – 95:2			
	95:5-16			
	96:23 – 98:5		Question at 96:23-97:1, 97:4-5 calls for legal conclusion	
	105:4 – 106:4			
	108:8-10	108:10-16	Incomplete	Non-responsive (108:10-16)
	109:14 – 110:2	112:16-113:1		Hearsay (112:19-113:1)
	116:4-6			
	118:1-7			
	118:16 – 119:3		Question at 118:16-17 calls for	
	119:19 – 127:4	119:7-11	Questions relating to 4, 5, and 6: Best evidence is the document itself; calls for speculation	Opinion (119:10-11), incomplete (119:7-11)
	128:4 – 129:2			
	129:19 – 132:25	129:3-18	Incomplete	
	133:1 – 134:2	134:3-24	Incomplete	
	134:25 – 135:15			
	136:7-10	135:16-136:6; 136:10-13	Incomplete	Narrative (135:20-136:6), opinion (136:4-6), non-responsive (136:10-13)
	138:8-12	137:9-138:7		Narrative (137:12-138:7)
	144:21 – 145:2			

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	146:10-12			
	146:17 – 147:20	147:21-148:18		
	148:19 – 149:9	149:10-14		
	150:22 – 152:6		Questions at 150:22-25, 151:15-16 call for speculation; mischaracterize witness' testimony	
	153:12 – 154:13		Question 154:2-4: Mischaracterizes witness' testimony	
	158:6 – 159:4		Question at 158:13-14: Mischaracterizes	
	160:3-10		Incomplete; nonsensical	
Green, Blake				
	9:8-11			
	12:12-24			
	14:8-18			
	15:3 – 16:5	16:6-13		
	17:14-21	17:22 - 18:16		
	18:17 – 19:6		Relevance	
	26:6-14		11-14 Relevance	
	27:23 – 28:11		Relevance	
	28:14 – 30:4	30:5-12 32:5-13	Relevance Beyond the Scope of the Deposition Notice	

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Defendants' Objections to Plaintiffs' Counter Designations

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	33:2-8	127:7-21		
	34:21 – 35:10	34:16-20	Relevance	Opinion (34:16-20)
	37:21 – 39:13			
	41:17-25			
	43:16 – 44:1	42:1 - 6		
	44:2-23			
	49:14-18			
	50:16 – 51:12			
	51:13 – 52:7			
	52:8 – 53:10		53:2-10 -- Relevance	
	53:21 – 54:13			
	54:14 – 55:3	55:12-18		
	60:18-24			
	62:14 – 63:2	62:6-13 63:17-23	Relevance	
	70:18 – 71:22		71:4-11 -- Relevance	
	71:23 – 72:15			
	74:8-25			
	75:1-21			
	76:6 – 77:16	76:17-25	Incomplete insofar as it does not include the full	Narrative 76:16-25), conclusion (76:19-21), opinion (76:22-25)
	77:20 – 78:23		Relevance	
	79:21 – 80:22		80:17-22 --	
	80:24 – 82:17	82:18-22		
	83:11-18	85:3-9		
	84:15 – 85:2		Relevance Speculation	
	86:8 – 87:3		Relevance	

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	87:11-19		Relevance	
	89:5 – 90:7		Relevance	
	90:14 – 92:4		Relevance	
	92:10 – 93:1			
	95:20-23		Relevance	
	96:13-21	96:10-12	Incomplete insofar as it does not include the full question (96:10-12).	Irrelevant (96:10-12), incomplete (96:10-12)
	97:10-20	98:2-5		
	104:15 – 105:5			
	105:12 – 106:13	106:25 - 107:7		
	111:13 – 112:9		112:4-9 -- Relevance	
	125:22 – 126:7			
	126:21 – 127:21			
	127:22 – 129:23	130:19-23	Asked and answered as to: 128:3-13	
	129:25 – 130:18			
	130:25 – 131:15			
	131:16 – 132:6			
	132:10 – 133:1	132:7-9		
	134:12 – 135:22			
	139:23 – 141:6			
	141:7 – 142:5	142:6-14		
	145:15 – 146:15		Incomplete insofar as it does not include the full	
	146:23 – 147:17			

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Defendants' Objections to Plaintiffs' Counter Designations

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	147:18 – 148:17	148:18-22	Incomplete insofar as it does not include the full question (148:18-	(148:18-22) - irrelevant, immaterial, no foundation, hearsay, contains inadmissible statements, no authentication
	148:23 – 149:22			
	150:4-14	150:1-3	Incomplete insofar as it does not include the full question (150:1-3)	(150:1-3) - irrelevant, immaterial, no foundation, hearsay, contains inadmissible statements, no authentication
	152:24 – 153:14			
Guzman, Daniel				
	5:3-5			
	9:10-10:4			
	10:8-10			
	10:22-11:3			
	12:3-14			
	13:10-14			
	14:3-6			
	15:22-16:4			
	17:2-10			
	17:13-18:11			
	19:3-17			
	10:5-21:4			
	21:7-12			
	21:16-22:4			
	27:8-14			
	28:6-30:15			
	30:25 - 30:25			
	32:3-12			

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	33:11-34:1			
	34:5-36:12			
	36:16-23			
	37:7-38:6			
	38:16-41:17			
	42:7-11			
	42:15-43:4			
	43:13-44:11			
	44:24-45:12			
	46:8-25			
	47:4-48:10			
	49:5-25			
	50:6-18			
	53:10-24			
	59:21-60:23	60:24-61:11; 61:20-65:10		
	79:6-9			
	85:19-22			
	89:22-24	89:25-90:16		
	90:17-91:11			
	91:15-25			
	92:7-15			
	93:9-25			
	95:1-7			
	96:14-16			
	100:17-101:6		Series of Objections as to relevancy, lack of foundation (objection interposed at time	

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	101:23-105:24		Series of Objections as to relevancy, lack of foundation (objection interposed at time	
	106:1-9		Series of Objections as to relevancy, lack of foundation (objection interposed at time	
	106:13-23			
	106:25-107:13			
Harless, Patricia				
	8:11-13			
	10:14-37:10		10:14-12:23 -- Relevance 17:5-19:13 -- Sidebar	
	38:6-41:19			
	42:15-44:19			
	45:3-66:3		48:13-51:21 --	
	82:16-83:8			
	84:9-85:25			
	86:4-17			
	86:25-87:3			
	87:18-25		Relevance	
	88:5-13			
	91:4-25			
	92:16-24			

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	97:11-98:8			
	102:20-103:17		Relevance	
	105:18-106:22			
	109:14-111:6			
	115:12-119:12			
	120:23-121:13			
	127:6-18			
	130:21-132:4			
	134:3-135:19			
	136:11-22			
	139:6-141:15			
	142:12-143:7			
Hebert, Bryan				
	20: 14-21	20:1-22:3	Hearsay insofar as describes communications with DPS.	
	33: 2-8	33:9-15	Hearsay insofar as describes communications from unidentified individuals concerning voter	
	48: 11-18	48:19-25		
	49:1- 51:23			
	52:14-22			
	53:13-24			
	55:16-25		Speculative.	
	66:10-23			

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	73:5-17			
	74:7 – 75:13			
	88:14 – 89:7			
	97:16-25			
	111:12 – 112:20			
	116:25 – 119:4			
	121:20 – 122:4			
	123:25 – 125:20			
	140:10 – 142:7			
	147:18 - 148:1			
	157:10-15			
	158:17- 160:24			
	162:10 - 163:23			
	165:4 – 165:17			
	169:14-20			
	172:19 – 174:15			
	180:3-11			
	185:9 – 186:1			
	192:14 – 193:5			
	200:2 – 201:16			
	202:6–20			
	225:10 – 227:15			
	233:13 – 234:1	234:2-18		
	239:3-12			
	241:2 – 242:2			
	242:24 – 243:17			
	265:17-22			
	271:15-25			
	275:17 – 276:4	276:5-14		

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	277:16 - 278:1	277:2-15		
	282:19 – 283:9		Hearsay insofar as witness describes testimony in hearing. Document speaks for itself	
Holmes, Marvin C.				
	7:14-17			
	9:10-21			
	13:22-14:8			
	19:3-5			
	19:10-11			
	19:25-20:11			
	20:18-21:3			
	21:25–22:9			
	25:8-18			
	27:24 – 28:7			
	28:14–29:7			
	29:14-22			
	30:5-11			
	31:18-25			
	36:21–37:5			
	37:17–38:22	37:6-37:11		
	39:16–40:24			
	41:4-8			
	41:12-15	41:9-11, 108:12-20		
	42:8-13			
	43:2-8			

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	43:12-44:1		Assumes facts not in evidence/ lack of foundation (objection interposed at time	
	44:6-45:19	44:2-5		
	46:20-47:22			
	49:3-8			
	49:17-24			
	50:2-25			
	51:15-19			
	52:15-22			
	53:11-20			
	54:8-56:4			
	57:9-20	56:98-59:10		
	58:1-23			
	59:4-24			
	60:5-62:5			
	62:14-66:12			
	66:23-67:4			
	67:14-21			
	67:24-68:5			
	68:8-23			
	69:16-19			
	73:6-19			
	74:1-13			

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	76:13-25-78:21		78:17-21 – Relevance; calls for speculation (objection	
	79:2-21			
	80:25- 81:16			
	81:19-83:6			
	83:17-84:16			
	85:1-6			
	87:14-21			
	88:15-90:22			
	90:25-91:10			
	91:21-92:10			
	92:25-93:7			
	93:18-23			
	94:7-16			
	94:23-95:6			
	96:23-25			
	98:1-99:3		Assumes facts not in evidence (assertions concerning availability of free voter ID assume facts not in	
	99:19-100:25			

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	103:13-104:10		Series of Objections as to relevancy, lack of foundation and reasons stated in deposition	
	105:3-106:5		Series of Objections as to relevancy, lack of foundation and reasons stated in deposition	
	106:21-107:9		Series of Objections as to relevancy, lack of foundation and reasons stated in	
	107:13-17			
	108:2-4			
Ingram, Keith				
	12:9-18:2		Irrelevant insofar as includes deposition instructions. Improper and incomplete as fails to include full	
	21:2-25:23			
	27:18-28:5			
	30:2-24		Lack of personal knowledge.	

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	34:8-12		Improper insofar as includes an answer at 34:8 without preceding question	
	44:5-14			
	45:18-46:5		Improper insofar as includes an answer at 45:18-19 without preceding question	
	46:9-18			
	46:24-48:13			
	48:23-49:6			
	49:15-50:13			
	51:5-54:11	54:12-20	Lack of personal knowledge; Speculative.	
	54:21-55:24	54:12-20, 55:25-56:3	Hearsay insofar as purports to represent communications	
	56:4-21		Hearsay insofar as purports to represent communications	
	57:4-59:11			
	63:10-64:4			
	67:11-70:24			

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	72:11-74:25		Hearsay insofar as purports to represent communications	
	75:23-76:24			
	77:12-78:9	77:8-11		
	81:17-82:19			
	86:20-88:25			
	92:15-16			
	93:12-18			
	93:22-95:15		Lack of personal knowledge; Speculative as to 95:8-16. Incomplete; fails to include whole	
	95:22-96:8		Improper insofar as fails to include whole question from 95:17-21	
	97:4-18			
	101:8-11			
	115:10-21			
	121:13-122:14			
	124:9-21			
	125:18-127:4			
	127:18-129:7			

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	130:21-131:3		Hearsay insofar as purports to represent communications	
	144:4-25			
	146:4-148:7	148:8-21		
	157:11-158:14			
	161:13-25	160:25-161:12, 162:1-3	Improper insofar as fails to include answer to question at 161:24-25	
	182:5-183:3			
	183:8-185:1			
	186:17-188:12			
	216:6-219:24			
	226:1-227:19			
	231:11-233:19		Relevance	
	235:13-236:9			
	252:8-253:25			
	254:5-18			
	258:23-259:6			
	259:22-260:20		Hearsay insofar as purports to represent communications	
	263:9-264:22			
	278:2-282:3			
	282:12-283:4	287:11-14		
	284:7-15			

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	284:23-285:7			
	285:24-287:10			
	287:15-23			
	288:25-289:8			
	290:22-291:24		Hearsay insofar as purports to represent results of	
	292:12-23		Hearsay insofar as purports to represent results of	
	293:7-296:11			
	298:9-299:18			
	306:20-307:7			
	309:1-310:17			
	311:2-13			
	312:5-313:1			
	315:2-316:20		Assumes a fact not in evidence insofar as document contradicts	
	318:10-320:14			
	329:18-330:5	330:6-14		
	333:23-334:7			
	334:19-335:4			
	339:9-340:10			
	345:9-346:3			
	353:10-354:5			
Jackson, Virginia				
	5:15-17			

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	8:4-7			
	8:10-13	8:14-15		
	13:12-14:2			
	14:9-17	15:2-11		
	15:25-16:11			
	16:12-18:4	18:5-19:20		
	20:3-4	20:5-11		
	21:11-15			
	30:12-32:4			
	32:5-22			
	34:2-16	33:5-34:1		
	35:3-6	35:7-11		
	35:12-19			
	36:25-37:16	37:17-38:5		
	42:24-43:9	43:10-15	Incomplete; mischaracterizes witness' testimony	
	43:21-22			
	44:1-8			
	44:14-45:1			
	45:14-46:3	46:4-9		
	48:2-11			
	48:17-49:12	49:13-16		
	50:9-20			
	51:11-52:4	52:5-14		
	53:23-54:4	54:8-14	54:1-2: Calls for speculation	
	55:21-56:15	55:4-5, 55:9-20	56:6: Calls for speculation	

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	57:10-58:3			
	59:7-15	58:9-12		
	60:21-61:3			
	61:14-24			
	63:6-11			
	63:12-24			
	64:3-9			
	65:12-17	22:3-22:12, 75:7-11, 75:15		
	66:2-68:13			
	68:16-69:20			
	70:25-72:2			
	72:10-19			
	72:23-74:16			
	78:2-14			
	79:8-16			
	80:7-12	80:2-6		
	81:2-8			
	81:18-22	81:23-82:8		
	83:14-22			
	83:25-84:18			
	84:19-22			
	85:3-88:10	84:25-85:2	No foundation; calls for speculation; assumes facts not in evidence.	
	88:11-21	89:5-12		
	98:18-22			
	98:23-101:16		100:24-101:16: Relevance	

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Defendants' Objections to Plaintiffs' Counter Designations

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	103:8-15		Irrelevant	
	104:9-15			
	113:19-22			
	109:16-110:4		109:20-22 calls for speculation	
	110:22-25			
	115:20-116:4	115:4-19	Incomplete	
	118:17-24	115:4-14		
Jewell, Kevin				
	4:5 -7			
	4:21-23			
	8:3-11			
	10:16-19			
	11:3-5	11:6-12:10		Foundation, speculation, and hearsay
	15:2-18			
	16:15-22			
	18:1-24			
	21:13-18			
	22:11-15			
	26:6-18			
	29:1-7	29:8-32:20		Foundation, speculation, and hearsay
	31:21-25			
	32:15-33:13	33:14-34:7		Foundation, speculation, and hearsay
	34:8-35:1			
	35:13-36:7			
	36:17-36:20	36:12-16		Foundation, speculation, and hearsay
	37:5-9			
	38:22-39:9	38:11-21		
	41:1-21			

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Defendants' Objections to Plaintiffs' Counter Designations

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	42:10-43:19			
	44:6-13	44:14-24		Foundation, speculation, and hearsay
	44:25-45:3	45:4-46:17		Foundation, speculation, and hearsay
	46:18-47:14	47:15-16		Foundation, speculation, and hearsay
	47:17-48:13	48:14-50:09		Foundation, speculation, and hearsay
Lara, Margarito				
	9:14-12:13			
	12:17-19			
	12:22-13:25			
	14:3-16			
	15:3-17			
	16:1-5			
	17:6-7			
	17:25-20:4			
	21:18-21			
	24:4-7			
	24:25-25:13			
	25:22-26:5			
	26:17-27:3			
	27:9-28:17			
	29:22-30:12			
	30:20-31:22			
	32:5-22			
	33:3-14			
	33:20-23			
	35:14-37:9			
	38:11-39:11		Privilege	
	40:24-41:14			
	43:10-15			

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	43:18-44:21			
	46:12-47:18			
	49:9-16			
	49:20-22			
	50:4-17			
	52:12-25		Speculation; lack of personal	
	53:10-22			
	54:1-13			
	55:7-56:4			
	57:8-18			
	57:25-58:7			
	58:21-60:6			
	63:9-24			
	65:5-15			
	67:24-68:21			
	68:25-69:2			
	69:24-70:2			
	70:21-71:11			
	72:4-73:13			
	73:18-21			
	74:4-10			
	75: 5-76:11			
	77:2-78:17			
	79:6- 21			
	81:11-82:21			
	84:21-91:22			

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	91:25–92:25		Hearsay; relevance; lack of personal knowledge.	
	93:7-19		Hearsay; relevance; lack of personal knowledge.	
	96:23–99:14			
	100:4-15			
	100:22-25			
	101:1-24			
Lara, Maximina				
	7:14-25			
	8:1-4			
	8:8-11:11			
	13:15-18			
	14:5-15			
	14:25–15:14			
	15:22-16:10			
	17:18-19:19			
	21:13–25:24	25:25-27:4		
	26:22 – 28:8			
	28:12-20			
	32:9-33:3			
	33:18-23			
	34:15-17			
	35:6-36:25		35:6-36:7: Calls for legal conclusion; lacks personal	
	38:12-19			

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	38:25-36:10			
	40:2-5			
	40:15-21			
	41:14-18			
	42:10-18			
	44:5-45:25			
	46:2-48:23			
	49:15 –51:11			
	51:17-25			
	52:18-22			
	53:2-12			
	54:9-15			
	55:1-6			
	56:20- 59:25		Relevance	
	60:15-23			
	61:18-20			
	63:19-25			
	64:18-22			
	65:12– 66:7	65:7-11	65:12-17: mischaracterizes law fact; assumes facts not in evidence.	
	66:12–69:2		Relevance; hearseay; not	
Lydia, Linda				
	7:20–8:2			
	20:14-22	20:23-21:10		
	22:9-17			
	23:21-25	23:17-20		

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	25:2-13			
	26:3-9	25:24-26:2, 26:10-12	Incomplete	
	26:13-28:2			
	30:22-31:5			
	31:17-21	31:17-32:3	Incomplete	
	32:4-12			
	32:13-17			
	32:25-33:6			
	34:2-11	33:20-34:1, 34:13-25	Incomplete	
	35:4-36:4			
	37:14-23			
	38:21-39:13	39:14-20		
	39:21-40:6			
	40:19-23	41:4-7		
	57:2-19			
	59:22-60:2	60:3-13	Incomplete	
	60:14-62:1			
	62:14-65:18			
	43:18-25			
	51:21-25	51:9-20		
	52:3-53:8			
	66:1-16			
	68:5-21	68:22-69:6	Incomplete	
	69:23-70:12		Vague; calls for speculation	
	71:2-23			
	71:24-73:25			
	74:1-76:1			
	76:2-77:8			

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	78:10-23	78:24-79:18		
	79:22-25			
	80:10-15			
	80:18-81:11			
	81:25-82:7			
	84:10-17			
	84:21-85:2	84:18-20	Incomplete	
	86:4-87:7			
	88:9-89:16			
	89:17-90:1			
	90:2-13			
	90:14-92:6			
	92:7-14			
	93:20-23			
	97:7-25			
	100:23-101:14	99:3-4, 99:10-12, 100:14-22	Incomplete	
	102:8-12			
	107:1-108:20	105:21-106:4, 106:22-25, 108:21-110:10	Incomplete	
	114:23-116:5	113:19-20, 113:25-114:12, 114:16-22, 116:6	Incomplete	
	117:22-118:23	116:9-19, 117:15-21	Incomplete	
	121:8-20			
	126:15-127:8			
	127:9-128:3	128:4-16	Incomplete	
	128:17-130:25			
	131:6-22	131:23-132:2		
	132:20-133:11	133:12-134:1		(133:15-134:1) - narrative, opinion, incomplete

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	134:11-135:6			
	135:7-17			
	138:11-140:13	141:18-23		
	142:14-143:5	143:6-24		Opinion (143:9-16, 19-24)
	144:19-145:24	145:25-146:6	Incomplete	
	150:3-151:21	146:7-150:2		
	152:9-153:6	151:22-152:8		Conclusion (147:7-8), opinion (147:7-8, 149:2-4, 149:19-22), narrative (146:13-147:10), hearsay (148:3-5), speculation (149:19-22)
	153:7-10			
	153:11-25			
	156:5-157:9			
	157:15-158:6			
	158:20-24	158:11-19		Opinion (158:16-19)
	161:14-17	161:9-13		
Martinez, Emilio				
	4:17-20			
	6:16-7:1			
	7: 5-14			
	7: 17-23			
	8:2-13			
	8:22-9:3			
	9:6-16			
	10:20-11:6			
	11: 9-18			
	12:7-15			
	12:19-13:5			
	13:10-14:9			

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	15:7-21			
	20:14-21			
	20:22-21:3			
	21:6-8			
	22:8-25			
	24:17-25:3			
	25:11-16			
	26:4-28:6			
	27:9-24			
	27:25-28:19			
	29:1-30:16			
	30:20-22			
	31:14-32:8			
	32:15-21			
	32:22-33:4			
	33:23-34:8			
	34:17-36:14	36:15-38:3		
	38:4-25			
	39:6-40:12			
	41:16-23			
	41:25-42:18			
	43:11-15			
	45:4-46:12			
	46:13-19			
	48:7-12			
	49:11-50:7	50:10-51:5		
	51:8-22			
	52:3-5			
	52:12-53:15	53:16-22		

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Defendants' Objections to Plaintiffs' Counter Designations

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	53:23-54:8	54:9-18		
	55:20-56:2	55:13-56:2		Speculation (53:18-19, 21-22)
	56:8-12			
	58:6-18	57:2-58:23		Nonresponsive, narrative (57:12-20; 57:25-58:5 (starting at "And"))
	58:24-59:3	59:4 – 59:15		Nonresponsive (59:13-15 (starting at "And"))
	59:16-18	59:19-60:3		
	60:4-25			
	61:4-16	61:17-62:16		
	62:17-63:4			
	63:13-15	63:22-65:4		
	65:6-13	65:14-24		
	66:11-14			
	68:2-5	68:6-13		
	36:15-37:19			
	68:14-69:23			
	70:15-71:3	71:4-20		
	71:21-72:3	72:4-72:18		Speculation (72:7-8; 17-18)
	72:19-23	73:8-16		Speculation (73:10-11; 13-16)
	73:17-22			
	74:1-75:23	75:24-78:7		
	78:8-16			
	78:17-79:14			
	79:20-25	75:24-78:7		
	81:6-82:7			
	82:8-86:22			
	86:23-89:16			
	90:3-6			

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	90:14-91:1	91:2-93:2		
	93:3-16	93:17-95:2		Nonresponsive (94:6-7 (starting at "No, I cannot"; 9-12)
	95:3-11			
	95:16-22			
	97:2-6		Relevance	
	99:19-100:18	100:19-103:19		
	103:20-104:3			
	104:20-105:2			
McCoy, Janice				
	7:22-8:1			
	11:1-3			
	13:22-15:12			
	17:4-18:25			
	23:15-85:10		26:4-9; 81:22 - 82:1; 82:13-15 -- Relevance 38:8 - 39:21; 57:22 -	
	87:6-171:19		93:5-15; 96:3 - 96:9; 98:7-18; 100:5-13; 103:8-13; 104:16- 22; 108:5-21; 124:3- 8; 126:23 - 127:9; 129:21-24 -- Relevance 102:21 - 103:4;	
	180:6-187:4			
	187:15-210:1		203:2-14 --	

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Defendants' Objections to Plaintiffs' Counter Designations

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	210:21-279:8		210:2-19; 222:3 - 223:3; 270:10 - 271:20; 272:16 - 273:5 -- Relevance 217:13 - 218:4 -- Speculation 245:3 - 247:11 -- Hearsay	
	280:15-282:25			
McGeehan, Ann				
	6:1-14			
	11:11-17:14			
	18:5-20			
	21:8-26:23		26:3-13 --	
	27:7-42:16			
	43:8-45:2			
	52:2-86:19		62:15-20; 74:10-14 -- Hearsay	
	87:19-102:3		Object to designation of partial statement,	
	102:4-111:14			
	120:1-122:10			
	123:23-126:12			
	133:23-134:13			
	136:12-137:4			

Veasey v. Perry

Defendants' Objections to Plaintiffs' Counter Designations

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	146:19-156:25	157:6-158:11	152:1-19, 154:6-11, 155:2-13, Asked and answered; Assumes facts not in evidence, 152: 20-153:14; vague,	157:6 - 158:11 - Relevance
Mellor-Crummey, John				
	5:6-13			
	7:23-8:2			
	8:5-12			
	8:22-24			
	9:2-11			
	9:21-24			
	10:2-4			
	11:5-16			
	10:17-23			
	11:21-25			
	12:1-11			
	12:12-14			
	12:18-13:4			
	13:12-14:8			
	14:9-15:11			
	15:15-22			
	20:19-25			
	21:1-22:3			
	22:10-22			
	23:18-24:2			
	24:15-21			
	26:13-27:5		Relevance	

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	27:11-28:6		Relevance	
	29:20-30:5		Relevance	
	31:4-32:15			
	32:24-33:5			
	35:1-6			
	35:22-36:1			
	37:10-38:2			
	39:12-14			
	41:19-42:14			
	42:25-43:7			
	43:25-44:6			
	44:9-14			
	46:16-51:7			
	51:25-53:1			
	53:2-55:24			
	57:6-25			
	58:18-59:2			
	60:2-20			
	60:24-65:10			
	66:11-25			
	67:3-68:3			
	68:5-71:2			
	71:6-72:13			
	72:14-73:1			
	73:2-76:4			
	76:7-16			
	76:20-77:6			
	77:7-22			
	79:22-80:7			

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	80:10-82:11			
	82:21-24			
	83:9-85:23			
	88:16-21			
	89:9-90:20			
	90:21-91:3			
	91:9-11			
	91:15-92:18			
	92:22-95:7			
	95:13-96:9			
	96:14-98:10			
	98:14-24			
	99:7-100:16			
	102:11-103:3			
	103:9-106:1			
	106:3-107:17			
	107:21-109:11			
	109:15-110:2			
	110:9-12			
	110:13-16			
	110:20-111:2			
	111:20-23			
	112:21-25			
	113:6-9			
	113:10-23			
	117:25-121:16			
	121:17-122:9			
	122:22-123:4			
	124:14-16			

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	124:17-23			
	125:19-126:2			
	127:9-128:24			
	131:1-4			
Mendez, Eulalio				
	8:15-17			
	9:15-12:21			
	13:13-14:8			
	14:12-16:2			
	16:17-18:6			
	18:14-22:3	22:4-7		
	23:3-14			
	24:6-14			
	24:22-25:11			
	26:17-31:12			
	31:23-34:17			
	35:7-11			
	35:19-21			
	36:1-8			
	37:4-9			
	37:17-40:8			
	40:15-42:21			
	44:13-25			
	46:5-47:5			
	48:12-20			
	48:24-49:5	49:6-7		
	49:11-20			
	50:9-60:7			
	51:21-25			

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	53:4-10			
	53:21-54:11			
	57:24-58:15			
	58:12-14			
	59:14-61:3			
	61:15-62:6			
	62:22-65:3			
	65:10-68:5			
	69:15-17			
	69:24-70:14			
	71:5-10	71:11-12		
	71:20-22			
	71:23-72:2			
	73:14-16			
	73:21-75:2			
	75: 6-77:21		76:2-10: lack of personal knowledge; calls for	
Mora, Kristina				
	4:5-7			
	4:13-14			
	5:11-22			
	9:1-5			
	18:6-11			
	23:15-22			
	24:4-6			
	24:19-26:1	26:2-14		
	26:15-19			
	29:16-30:24			

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	32:25-33:11		Designation does not include the question preceding	
	42:11-43:5			
	57:14-58:18			
	58:22-59:25			
	63:3-11	63:12-16		
	64:15-17		Mischaracterization /misstatement of witness testimony by counsel (objection)	
	64:21-65:8			
Ortiz, Miguel				
	5:11-15			
	9:15 – 10:17			
	10:25 – 11:11			
	11:14-25			
	12:5 – 13:21			
	16:10 – 17:6			
	20:11 – 21:14			
	22:4 – 23:8			
	23:24 – 24:10			
	24:14 – 25:23			
	26:11 – 27:9			
	28:17 – 30:22			
	32:16-25			
	33:5-23			
	38:13-22			

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	39:9-11			
	42:7-18			
	43:8 – 44:23			
	44:24 – 45:25			
	46:1-23			
	47:4-25			
	49:15 – 50:6			
	53:25 – 54:15			
	57:19 – 59:12		58:25-59:1 asked and answered	
	62:15 – 63:1			
	63:10-15			
	63:20 – 64:12			
	64:13 – 65:15			
	66:1-4			
	66:12 – 67:3			
	67:18 – 68:11		67:12-14; 67:24-68:1; 68:5-8, 68:18-68:22 -- Vague;	
	68:20 – 69:14		69:4-6 -- Vague; ambiguous;	
	75:19 – 77:3	75:6-13		Non-responsive (75:9-13)
	77:4-19			
	78:18 – 80:9		80:3-5 -- Vague; D1180ambiguous	
	84:22 – 85:3			
	85:11 – 86:20			
Oshinnaiye, Yemi				
	5:9-19			

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	10:19-25			
	11:7-12:6			
	12:18-13:8			
	13:13-21			
	14:7-19			
	15:6-25			
	23:19-24			
	31:7-21	31:22-25		
	32:8-33:13			
	38:25-40:10			
	42:10-43:1			
	44:23-45:6			
	45:7-46:22	46:23-47:1		
	47:2-6			
	51:14-23			
	51:24-52:15			
	54:6-59:13			
	60:9-61:8			
Patrick, Dan				
	9:11-13			
	19:2-20:22			
	29:8-30:4			
	31:14-32:5			
	34:22-35:19			
	37:19-38:8	38:9-38:21		Question 38:13-17: multifarious/compound
	48:22-51:17			
	55:16-62:9			
	64:3-65:9			

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	84:6-85:23		incomplete citation - - Question starts at 83:3	
	87:9-25			
	106:6-15			
	114:6-115:3			
	115:14-118:17			
	122:2-125:14			
	129:25-134:16			
	151:4-152:17			
	161:14-168:6			
	170:19-174:13			
	177:6-179:7			
	193:2-194:16			
	227:22-230:3	225:8-227:21		Objection (225:8-10): asked and answered
	235:2-236:8	233:18-235:1		Objection (234:7-10): vague, calls for speculation, foundation
	239:20-241:18			
	246:18-247:8			
	248:7-22			
	253:3-254:5			
	256:1-257:3			
	274:8-276:18			
	296:8-16			
	297:14-24			
	307:19-328:2	305:18 - 306:1		Objection (305:18-19): argumentative
Peters, Joe				

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	13:5-13			
	19:15-22			
	68:22-69:11			
	80:13-81:1			
	85:14-17	86:7-19		
	86:20-87:17	89:18-90:7		
	94:9-17			
	94:20-95:4	288:15-24		
	96:4-25			
	149:22-150:4			
	150:15-151:4			
	170:6-171:25			
	173:18-22			
	175:10-13			
	184:16-185:1			
	201:19-203:11	203:12-17		
	210:20-211:5		Unresponsive, 210:25-211:5	
	216:10-217:3	217:4-217:13, 218:10-219:2; 231:16-232:7		
	228:7-13			
	243:15-244:15	244:20-245:15		
	255:20-256:12	257:13-258:3		
	258:23-25	258:4-13		
	274:18-21			
	280:21-281:16			
Rodriguez, Tony				
	8:7-10			
	10:20-13:11			

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	14:7-19			
	14:23-15:19			
	19:2-16			
	25:25-26:15			
	26:22-27:3			
	27:12-24			
	28:5-15			
	28:16-21			
	30:14-20			
	33:16-35:2			
	35:23-38:18			
	39:11-40:5			
	40:22-25			
	41:3-43:1	41:1-41:2		
	44:21-45:4	45:5-45:13		
	46:9-47:5			
	47:6-48:10			
	50:13-21			
	50:22-52:3	52:4-15		
	54:14-55:13			
	56:13-57:1			
	57:4-11			
	62:10-65:18			
	68:12-71:25			
	72:15-19			
	78:23-80:5			
	82:16-83:13			
	84:21-85:25			
	86:4-22			

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	90:7-93:15	93:22-94:3		
	93:19-21			
	94:4-95:11			
	95:13-97:24			
	97:25-98:18			
	98:23-99:1			
	101:5-24			
	102:5-107:1			
	109:12-111:16			
	115:11-116:2			
	116:11-24			
	120:11-25			
	121:9-18			
	121:25-122:23		Hearsay, 122:17-23	
	129:9-15			
	135:3-16			
	139:7-13			
	146:6-148:24			
	150:4-151:2			
	152:5-19			
	155:16-23			
	156:3-158:4			
	159:3-7			
	172:5-175:11			
	176:2-6			
	177:4-7			
	187:5-14			
	188:2-4	188:5-17		
	189:12-190:10			

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	190:16-192:9			
	193:3-18			
	194:21-195:23			
	199:6-200:7			
	200:24 - 200:24			
	201:16 - 201:16			
	202:3-8			
	202:12-203:14			
	205:5-206:23		Hearsay, 205:20-23	
	207:17-208:1			
	210:20-211:6			
	211:19-212:1			
	212:7-17			
	213:5-215:14			
	216:7-10			
	227:8-22			
	242:4-10			
	248:22-250:5			
	252:24-253:11			
	254:13-255:7			
	262:9-263:16			
	264:3-11			
	266:13-267:20			
	269:15-18			
	273:14-274:5			
	274:19-276:15			
	277:7-9			
	277:20-278:3			
	281:13-282:8			

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	285:15-25			
	288:12-289:4			
	289:20-290:14			
	299:9-20			
	302:2-17			
	309:16-310:2			
	310:25-311:14			
	312:22-313:8			
	313:13-314:25			
	317:14-318:4			
	319:2-332:9			
Rudolph, Michelle				
	7:3-9			
	13:2-20			
	13:21-14:7			
	14:8-10			
	14:11-25			
	16:17-17:8			
	17:14-22			
	18:7-19:9			
	19:19-23	19:24-20:2		
	26:21-27:12			
	33:14-35:6			
	42:5-24			
	44:1-45:12			
	46:17-47:5			
	47:18-24			
	49:18-50:15			
	52:14-22			

Veasey v. Perry

Defendants' Objections to Plaintiffs' Counter Designations

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	54:24-55:16			
	55:17-58:22			
	60:6-20	59:8-15		
	61:20-64:21			
	66:11-71:16			
Sanchez, Hector				
	4:7-11	5:17-23		
	6:3-10			
	7:11-16	7:17-21		
	8:1-12			
	8:17-25			
	9:1-21			
	10:6-20			
	11:21-13:21	13:22-14:2	Incomplete	
	14:3-15:20			
	16:7-15			
	16:16-17:5			
	22:20-23:14			
	24:12-17			
	25:2-3			
	25:6-9			
	28:20-31:3			
	31:11-17			
	32:10-11			
	32:21-33:24	33:25-34:2	32:25-33:24 -- Relevance, Foundation.	
	34:3-35:15			
	35:20-36:19		Incomplete	

Veasey v. Perry

Defendants' Objections to Plaintiffs' Counter Designations

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	40:5-16		40:13-16 Objection as to Exhibit 5 Relevance,	
Strausler, Steve				
	9:17-20			
	10:13-15			
	15:4-25			
	16:1-11			
	16:24-17:2			
	30:12-31:24			
	34:14-35:3			
	38:10-39:14			
	40:15-41:3			
	41:4-14			
	41:21-42:24			
	42:25-43:5			
	43:6-44:1			
	45:12-48:3			
	48:4-49:1			
	53:11-54:2			
	54:6-56:11		Calls for speculation 55:7-16)	
	57:6-58:8			
	58:10-61:25			
	62:10-18			
	62:19-65:6			
	69:15-70:14			
	72:10-73:9			
	74:7-75:4			

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
Taylor, Lenard				
	4:24-1			
	8:11-18			
	9:2-7			
	9:16-18			
	10:11-15	10:16-11:1		
	11:12-13			
	11:16-20			
	11:22-13:17	13:18		
	16:25-17:16	14:13-15:1		
	17:19-18:1			
	20:19-21	20:22-23		
	21:16-24			
	22:7-19		Relevance	
	25:17-23			
	28:24-29:4			
	30:8-13			
	32:21-33:9			
	33:19-24			
	24:20-22			
	35:12-15			
	39:16-22			
	40:2-9			
	41:20-23			
	44:5-11			
	46:12-19			
	51:7-19		Relevance	
	52:1-3		Relevance	
	52:11-17		Relevance	

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	52:23-53:12		Relevance	
	53:25-57:5		Relevance; lacks personal	
	58:3-59:1	59:2-4	Relevance	
	59:12-60:6		Relevance	
	60:15-61:7		Relevance	
	61:24-62:11		Relevance	
	62:20-63:11			
	63:19-66:11		Relevance	
Valdez-Cox, Juanita				
	6:3-8			
	9:9-11			
	13:3-25			
	14:5-15:15			
	15:21-16:13			
	17:2-13			
	18:10-19			
	19:7-23:23			
	24:1-2			
	24:5-25:1			
	25:11-15			
	25:20-26:9			
	26:18-28:13			
	28:17-29:2			
	29:13-16			
	31:24-32:12	32: 13-16		
	33:1-12			
	33:23-34:3	34: 4		Sidebar
	34:5 - 34:5			

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	34:21-35:8			
	36:6-23			
	37:15-38:16	37: 11-15		
	39:3-7			
	39:22-40:6			
	40:9-19			
	40:24-41:1			
	42:20-22			
	47:5-6			
	47:14-15			
	48:5-22			
	49:9-11			
	50:4-15	50:16-51:2		
	51:3-5	51:6-18		
	51:19-20			
	51:24-25			
	52:17-18	52:19-22		
	55:18-21			
	57:1-25	58:1-17		
	59:4-16			
	60:10-61:2			
	62:23-63:24			
	75:16-19			
	75:25-76:12			
	76:22-24			
	77:7-14	77:15-78:3		Sidebar
	81:1-13			
	81:24-83:4			
	84:17-87:6			

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	87:23-88:9	87:14-22		
	88:12-88:12	88:13-18		
	88:19-88:24			
	89:2-90:9	90:10-11		Relevance
	90:12-91:5			
	90:18-21			
	93:21-24			
	94:2-8			
	94:18-23			
	95:5-25			
	96:5-19			
	96:23-25			
	97:3-99:14			
	99:22-25			
	105:14-23			
	106:9-13			
	106:25-107:2			
	108:24-109:6			
	109:18-110:1			
	113:1-114:9			
	114:22-115:1			
	115:5-14			
	116:9-117:17			
	118:4-11			
	123:12-14			
	123:19-124:7			
	125:10-11			
	128:9-129:9			

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	130:10-131:6		Assumes facts not in evidence, document not authenticated, hearsay, irrelevant	
	131:24-25		Assumes facts not in evidence, document not authenticated, hearsay, irrelevant	
	132:12-18		Assumes facts not in evidence, document not authenticated, hearsay, irrelevant	
	133:2-134:5		Assumes facts not in evidence, document not authenticated, hearsay, irrelevant	
	134:24-135:20		Assumes facts not in evidence, document not authenticated, hearsay, irrelevant	
	135:24-137:3		*Assumes facts not in evidence, document not authenticated, hearsay, irrelevant, include 137:4-8 if	

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	137:9-12		Assumes facts not in evidence, document not authenticated, hearsay, irrelevant	
	137:14-138:17		Assumes facts not in evidence, document not authenticated, hearsay, irrelevant	
	141:15-24			
	143:8-12	143:13-17		
	143:18-20	143:21-144:20		
	144:21-145:18	145:19-21		
	145:22-147:15			
	149:2-5			
	151:12-19			
	152:4-5			
	152:16-153:5			
	153:8-9			
	153:12-154:1			
	154:4-17	154:18-25		
	155:1-2			
	155:6-13	155:14-158:3		
	158:4-159:6	159:7-14		
Veasey, Mark (Dep 2)				
	5:8-11			
	7:7-11			
	7:25-8:11	8:11-17		
	8:24-9:21			
	11:13-21			

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	12:7-10			
	12:22-13:1			
	13:8-13			
	13:22-25			
	14:3-15:6			
	15:20-25	15:7-19		
	17:11-25	16:1-16		
	18:10-16			
	19:8-20:9			
	20:15-22:6			
	22:20-24			
	23:9-14			
	23:19-24:19			
	25:4-24			
	26:10-22			
	28:11-12			
	29:1-30:7	30:8-10		
	30:25-31:6	31:7-9		
	31:10-18			
	34:16-35:17			
	38:4-8			
	39:1-14			
	39:22-40:3			
	40:21-41:10			
	42:7-14			
	45:21-46:1			
	46:18-47:15			
	47:19-23	47:24-48:17		
	50:19-22			

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	50:24-51:9	51:10-22		
	52:5-25			
	53:15-54:2	54:3-4		
	54:5-8	54:9-10		
	54:11-17	54:18-19		
	56:5-11			
	57:1-60:2	60:3-61:15		
	61:16-62:22			
	64:25-65:6			
	65:24-66:2	66:5-14		
	66:23-67:14			
	69:7-16	68:20-69:3; 69:17-70:25; 73:5-74:9		
	74:20-75:12	76:4-78:6		Hearsay
	78:16-23			
	79:3-8	79:9-80:24		
	80:25-81:8			
	81:15-19	81:20-82:8		
	82:9-21			
	83:9-19	83:20-84:19		
	84:20-86:10			
	86:17-22			
	87:4-15			
	88:19-23			
	89:3-20			
	90:13-15			
	91:17-93:19			
	94:22-95:5	95:6-7		
	95:11-21			

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	96:11-97:1			
	97:3-103:20			
	104:1-105:2	105:3-23		
	105:24-106:4			
	106:8-108:14	108:15-109:4		
	109:6-20			
	110:3-5			
	110:7-111:23			
	112:7-17	112:3-6		
	113:1-6			
	113:9-114:3			
	115:5-11			
	115:20-22			
	116:17-21			
	123:12-124:2			
Washington, Phyllis				
	5:23-6:2			
	6:6-11			
	7:13-17			
	9:8-16			
	10:5-7			
	11:19-12:8			
	14:22-16:1			
	16:9-17			
	17:7-18:25			
	19:4-10			
	20:24-25			
	23:3-25			
	24:3-8			

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	24:11-20			
	25:1-21			
	26:1-27:10			
	27:11-14			
	28:1-24			
	29:2-6			
	29:13-19			
	29:23- 31:16			
	32:14-35:14			
	36:1-37:21			
	39:21-41:16			
	42:7-20			
	42:11-43:3			
	44:3-46:12			
	46:21-47:13			
	47:23-48:16			
	49:1-50:8			
	50:16-51:7			
	52:21-53:7			
	53:17-55:25			
	56:13-24			
	57:2-58:20			
	59:13-21			
	60:2-4			
	60:11-61:10			
	63:5-64:7			
	64:19-21			
	65:5-15			
	66:4-22			

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	67:1-8			
	67:19-69:15			
	69:23-70:3			
	70:16-72:16			
	72:19-21			
	73:2-11			
	73:17-74:9			
	74:24-75:25			
	76:3-21			
	76:25-77:14			
	78:5-79:14			
	79:17-25			
	80:1-10			
	80:14-24			
	81:17-25			
	82:1-8			
	82:14-85:7			
	86:3-88:4			
	88:14-89:11			
	89:15-24			
	90:9-91:8			
	91:13-94:7			
	94:11-96:11		94:16-95:6; 95:11-96:11 -- Relevance; lack of foundation+D36 (objection interposed at time	
	96:15-18	100:16-18		

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	100:1–15			
	100:19–101:7			
	101:24–102:2			
	102:11–103:13			
	103:22–104:10			
	104:23–105:16			
	106:6-14			
	107:6-8			
	107:22–109:3			
	109:10–111:6			
	111:12-18			
	111:21-25			
	112:6-16			
	112:20–115:25			
	116:5–19			
	117:3-15			
	118:4-14			
	119:9-15			
	120:7 -24			
	121:9–122:17			
	122:20-25			
	123:19-24			
	124:18–125:17			
	126:23–130:8			
	131:16–132:25			
	133:21–134:16			
	135:1–11			
	136:7–22			
	137:20–139:12			

Veasey v. Perry

Defendants' Objections to Plaintiffs' Counter Designations

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	139:23-25			
	140:12-144:14			
	145:1-14			
	145:24-146:10		Objection to entire line of questioning as irrelevant, lacking in foundation, and vague/ambiguous (objection interposed at time	
	147:13-148:12			
	149:13-150:3			
	151:4-24			
	151:25-152:6			
Williams, Tommy				
	9:5-7			
	12:1-15:24		Sidebar	
	18:24-22:1-16		Relevance	
	25:5-27:6		Relevance	
	31:8-32:13			
	34:5-159:20		37:7-41:7 -- Relevance 67:8-70:11 -- Relevance 76:12-83:24 -- Relevance 156:4-159:20 --	
	160:24-161:18		Relevance	
	162:22-163:15	163:16-22		

Veasey v. Perry**Defendants' Objections to Plaintiffs' Counter Designations**

Witness	Texas Designation	Counter Designation	Objection	Def. Objection to Plaintiffs' Counter
	166:2-167:23			
	168:21-169:8			
	169:16-172:17			
	173:2-175:22			
	176:2-178:10	178:11-179:20		
	180:5-187:20		186:25-187:20 -- Relevance	
	188:13-206:14		193:5-194:3 -- Relevance	
	210:2-216:8			
	223:21-240:16			
	242:16-245:21			
	248:9-262:12	262:13-16	259:2-260:11 -- Relevance, argumentative, non- responsive	
	264:14-279:5			
	289:1-290:19			
	292:11-294-15			
	295:21-297:3			